



POTENTIAL HAZARDOUS WASTE SITE
IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION VI SITE NUMBER (to be assigned by HQ)
TXD 981600794

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II (Preliminary Assessment). File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force (EN-335); 401 M St., SW; Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME Growth Systems (See attachment A) B. STREET (or other identifier) 11811 Charles Street (See attachment A)

C. CITY Houston, D. STATE Tx E. ZIP CODE 77041 F. COUNTY NAME Harris

G. OWNER/OPERATOR (if known) 1. NAME Pete McLaughlin, Vice-President (See attachment A) 2. TELEPHONE NUMBER 713-937-1477

H. TYPE OF OWNERSHIP
☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☒ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION
Headquarters of a grounds maintenance firm.

J. HOW IDENTIFIED (i.e., citizen's complaints, OSHA citations, etc.) Texas Department of Agriculture files K. DATE IDENTIFIED (mo., day, & yr.) 10-20-84

L. PRINCIPAL STATE CONTACT 1. NAME Martyn Turner, TWC 2. TELEPHONE NUMBER 512-463-8541

II. PRELIMINARY ASSESSMENT (complete this section last)

A. APPARENT SERIOUSNESS OF PROBLEM
☐ 1. HIGH ☐ 2. MEDIUM ☒ 3. LOW ☐ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION
☐ 1. NO ACTION NEEDED (no hazard) ☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY:
☐ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: b. WILL BE PERFORMED BY:
☒ 4. SITE INSPECTION NEEDED (low priority)

C. PREPARER INFORMATION 1. NAME Phyllis Frank, Engineering-Science 2. TELEPHONE NUMBER 713-943-2922 3. DATE (mo., day, & yr.) 5-16-86

III. SITE INFORMATION

A. SITE STATUS
☒ 1. ACTIVE (Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if infrequently.)
☐ 2. INACTIVE (Those sites which no longer receive wastes.)
☐ 3. OTHER (specify): SUPERFUND FILE

B. IS GENERATOR ON SITE?
☐ 1. NO ☒ 2. YES (specify generator's four-digit SIC Code): 0782, 0783

C. AREA OF SITE (in acres) 3 acres D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES
1. LATITUDE (deg.-min.-sec.) 29° 53' N 2. LONGITUDE (deg.-min.-sec.) 95° 35' W

E. ARE THERE BUILDINGS ON THE SITE?
☐ 1. NO ☒ 2. YES (specify): Office building, storage shed.

160617

Reviewed by PH-ES
Date 11-15-86

IV. CHARACTERIZATION OF SITE ACTIVITY

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

A. TRANSPORTER		B. STORER		C. TREATER		D. DISPOSER	
<input checked="" type="checkbox"/> 1. RAIL	<input checked="" type="checkbox"/>	<input type="checkbox"/> 1. PILE	<input type="checkbox"/>	<input type="checkbox"/> 1. FILTRATION	<input type="checkbox"/>	<input type="checkbox"/> 1. LANDFILL	<input type="checkbox"/>
<input type="checkbox"/> 2. SHIP	<input type="checkbox"/>	<input type="checkbox"/> 2. SURFACE IMPOUNDMENT	<input type="checkbox"/>	<input type="checkbox"/> 2. INCINERATION	<input type="checkbox"/>	<input type="checkbox"/> 2. LANDFARM	<input type="checkbox"/>
<input type="checkbox"/> 3. BARGE	<input checked="" type="checkbox"/>	<input type="checkbox"/> 3. DRUMS	<input type="checkbox"/>	<input type="checkbox"/> 3. VOLUME REDUCTION	<input type="checkbox"/>	<input type="checkbox"/> 3. OPEN DUMP	<input type="checkbox"/>
<input type="checkbox"/> 4. TRUCK	<input type="checkbox"/>	<input type="checkbox"/> 4. TANK, ABOVE GROUND	<input checked="" type="checkbox"/>	<input type="checkbox"/> 4. RECYCLING/RECOVERY	<input type="checkbox"/>	<input type="checkbox"/> 4. SURFACE IMPOUNDMENT	<input type="checkbox"/>
<input type="checkbox"/> 5. PIPELINE	<input type="checkbox"/>	<input type="checkbox"/> 5. TANK, BELOW GROUND	<input type="checkbox"/>	<input type="checkbox"/> 5. CHEM./PHYS. TREATMENT	<input type="checkbox"/>	<input type="checkbox"/> 5. MOUND DUMPING	<input type="checkbox"/>
<input type="checkbox"/> 6. OTHER (specify):	<input type="checkbox"/>	<input type="checkbox"/> 6. OTHER (specify):	<input type="checkbox"/>	<input type="checkbox"/> 6. BIOLOGICAL TREATMENT	<input type="checkbox"/>	<input type="checkbox"/> 6. INCINERATION	<input type="checkbox"/>
				<input type="checkbox"/> 7. WASTE OIL REPROCESSING	<input type="checkbox"/>	<input type="checkbox"/> 7. UNDERGROUND INJECTION	<input type="checkbox"/>
				<input type="checkbox"/> 8. SOLVENT RECOVERY	<input checked="" type="checkbox"/>	<input type="checkbox"/> 8. OTHER (specify):	<input type="checkbox"/>
				<input type="checkbox"/> 9. OTHER (specify):			

See IV. E.

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

See attached comments.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☒ 2. LIQUID ☒ 3. SOLID ☐ 4. SLUDGE ☐ 5. GAS
Liquid wastes are rinsates,
Solid wastes are empty
containers.

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☐ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☐ 5. HIGHLY VOLATILE
☒ 6. TOXIC ☐ 7. REACTIVE ☐ 8. INERT ☐ 9. FLAMMABLE
☒ 10. OTHER (specify): Empty containers.

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below.

No records are available for Growth Systems. Purchasing records for GMS are available.

2. Estimate the amount(specify unit of measure)of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT None	AMOUNT Unknown	AMOUNT None	AMOUNT Unknown	AMOUNT None	AMOUNT None
UNIT OF MEASURE	UNIT OF MEASURE See attachment A	UNIT OF MEASURE	UNIT OF MEASURE See attachment A	UNIT OF MEASURE	UNIT OF MEASURE
<input checked="" type="checkbox"/> (1) PAINT, PIGMENTS	<input checked="" type="checkbox"/> (1) OILY WASTES	<input checked="" type="checkbox"/> (1) HALOGENATED SOLVENTS	<input checked="" type="checkbox"/> (1) ACIDS	<input checked="" type="checkbox"/> (1) FLYASH	<input checked="" type="checkbox"/> (1) LABORATORY PHARMACEUT.
(2) METALS SLUDGES	<input checked="" type="checkbox"/> (2) OTHER(specify): Watered Hydraulic Fluid	(2) NON-HALOGENATED SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		(3) OTHER(specify):	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			<input checked="" type="checkbox"/> (4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
(5) OTHER(specify):			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	(5) OTHER(specify):
			(6) CYANIDE	(6) OTHER(specify):	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			(10) METALS		
			(11) OTHER(specify):		

V. WASTE RELATED INFORMATION (continued)**3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).**

See attachment A.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.

See attached comments.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH				
3. NON-WORKER INJURY/EXPOSURE				
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN				
7. CONTAMINATION OF GROUND WATER				
8. CONTAMINATION OF SURFACE WATER				
9. DAMAGE TO FLORA/FAUNA				
10. FISH KILL				
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS				
13. CONTAMINATION OF SOIL	X			
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS				
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY				
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

- ☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☒ 3. STATE PERMIT (specify): TDA Applicator license 7824
☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER
☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER
☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

- ☐ 1. YES ☐ 2. NO ☒ 3. UNKNOWN

4. WITH RESPECT TO (list regulation name & number): _____

VIII. PAST REGULATORY ACTIONS

- ☒ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

- ☒ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

X. REMEDIAL ACTIVITY (past or on-going)

- ☒ A. NONE ☐ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

ATTACHMENT A

POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT SUPPLEMENT SHEET

Instruction - This sheet is provided to give additional information in explanation of a question on the form T2070-2.

Corresponding number on form	Additional remark and/or explanation
I.A.	Growth Systems was purchased by Grounds Management Service Inc. (GMS) in October 1985. The Charles St. address was headquarters for Growth Systems and currently serves as headquarters for GMS. Turn north on Charles Street from State Highway 529. This intersection is one quarter mile west of State Highway 290. The site is on the south side of the road 1.3 miles from 529.
I.G.	Pete McLaughlin is with GMS. He did not work for Growth Systems. Information on past Growth Systems operations was obtained from Ben Mendoza, a former employee of Growth Systems, who is currently employed at Pampered Lawns.
V.C.2.b	Three of the stored 55-gallon drums were reported to contain hydraulic fluid that had been contaminated with water.
V.C.2.d	Two of the stored 55-gallon drums contained some liquid said to be rinsate from pesticide sprayers.
V.3.	GMS chemical usage (from Pete McLaughlin) Round up - 10 gal/month Topsun - 60 lbs/year Orthene - 60 lbs/year Growth Systems (from Ben Mendoza) Dursban, Diazinon, Orthene, Disyston, Lindane, Isotox, Malathion, Sevin, Captan, Zineb, Manzate, Kocide, Daconil, Benomyl, Funginex, Paragat, TriMik, Weed Be Gone, Round up, Phytar 560, 33 Plus, MSMA, Pramitol, Surflan, Eptam. Balan, RonStar and Princep granular products were also used. The products most used were Diazinon (15 gal/year), Captan (10-15 lbs/year) and Round up (50 gal/year). Figures are estimated.

TWC PA/SI PROJECT
PRELIMINARY ASSESSMENT COMMENTS
GROWTH SYSTEMS, INC.
HOUSTON, TEXAS
HARRIS COUNTY

DOCUMENTATION OF SITE ACTIVITIES

A TWC preliminary assessment of Growth Systems, Inc. was performed by Phyllis Frank of Engineering Science, Inc. Growth Systems, Inc. was purchased by Grounds Management Service (GMS) in October 1985. An interview with Pete McLaughlin, Vice President/General Manager of GMS, was conducted on May 6, 1986 beginning at 1:00 PM. A visual inspection of the headquarters site at 11811 Charles Street was performed immediately following the interview.

The site is located in west Houston in a primarily commercial area. The site has a main office building and equipment and chemical storage sheds. A small nursery is maintained on the west side of the property. Drums are stored in a small area along the south fence line. Photographs are attached to the report.

Pete McLaughlin had no knowledge of activities at the site preceding the October 1985 purchase of Growth Systems. Ben Mendoza, a former Growth Systems employee currently with Pampered Lawns, was interviewed by telephone on May 15, 1986 at approximately 3:30 PM.

DOCUMENTATION OF ADDITIONAL OPERATING SITES

GMS currently operates two substations. One substation is located at 11239A Crown Park Plaza. This substation is on the south side of Gears Road approximately 2 miles west of IH-45 at Greens Road. The office is in the southwest corner of the office park. This site was visited on May 8, 1986. Another substation operated by GMS is located at 8625 Schumacher. This site is one block south of Richmond between Crossview and Dunvale. The Schumacher site was visited on May 8, 1986 at 1:05 PM. GMS previously operated a headquarters site at 3218 Osage. This site was observed on May 8, 1986. Photographs of the sites are attached to the report.

Growth Systems headquarters was located at 11811 Charles Street at the site GMS currently uses as headquarters. Growth Systems also operated substations. One substation was the site at Crown Park Plaza that GMS is currently using. A site at Corporate Drive and Wilcrest was used for about 1 year and a site at an industrial park owned by Caldwell Banker at IH-610 and South Wayside was used for

approximately 2 years. The exact location of the latter two sites is unknown. These sites are no longer substations and are not in existence.

WASTE MANAGEMENT PRACTICES

GMS has been in business for approximately 5 years. Growth Systems was in business for 11 years prior to being purchased. Both firms were involved in grounds maintenance. However, GMS only did limited spot application of Roundup prior to purchasing Growth Systems. GMS purchases pesticides as required and temporarily stores them in a metallic storage shed. Inventory control is carefully maintained. Pesticide mixtures are sprayed on the area to be treated. When products to be sprayed are changed, the sprayer is cleaned. The sprayer is rinsed with a bleach (Chlorox) and water mixture. This rinsate is placed in a 55-gallon drum. Containers are rinsed with water and then a fixing agent. Both of these rinses are added to the mixture to be sprayed. A third rinse of bleach (Chlorox) and water is the final rinse. This rinse is placed in a 55-gallon drum. After rinsing, the containers are punctured and placed in the trash. A contract service, Quick Trash, picks up the trash. Substations use the same procedure. Pesticide application is very limited at the Crown Park Plaza substation. When a 55-gallon drum is filled, it will be taken to the headquarters site. No drums have yet been filled at the substations. Twenty-three drums are present at the headquarters site. Three drums are reportedly filled with watered hydraulic fluid. Two drums are reportedly mostly full with the pesticide rinsate. Other drums are reportedly empty. Bungs were not in all drums and rainwater may have accumulated in these drums. No drums have been disposed recently. Vegetation in the area is sparse, but no dead vegetation was observed.

A GMS employee at the GMS Schumacher substation showed a drum storage area that contained approximately 15 55-gallon drums. These drums were reportedly used for waste oil. No special drum used for pesticide residues could be identified. The exact method of disposal for the waste oil is unknown, but is presumably by an oil recycler.

Most of the products used by Growth Systems were only used at the headquarters site and were by used by the crews at the substations. Paper bags were burned near the back gate going to the nursery. Other containers were triple rinsed with water. The water was added to the mixture in the sprayer. Plastic and metal containers were then punctured and thrown in the trash which was picked up by a contract service. Glass containers were thrown in the trash without puncturing. The sprayers were rinsed once a day with water and a soap from Ford's Chemicals in Pasadena, Texas. This rinse was discarded on the large concrete pad

were it "generally evaporated". This practice was used when Ben Mendoza began work for Growth Systems. Mr. Mendoza worked for Growth Systems almost five years. Growth Systems used a 100-gallon and 200-gallon spray rig on trucks, four 30-gallon, wheel-mounted sprayers, and backpack and shoulder sprayers. The backpack and shoulder sprayers were used by the crews at the substations. The backpack and shoulder sprayers were rinsed at the job site and the rinse water was sprayed on the treated area. The area around the concrete pad is not vegetated. This area is also subjected to traffic. The impact of the residue disposal practice cannot be visually assessed.

Growth Systems was inspected probably twice in the past 5 years. No complaints or violations were noted. No permits were held except for applicators permit.

ASSESSMENTS AND RECOMMENDATION

The impact of the past waste disposal practice is difficult to assess visually. Some question regarding waste segregation and disposal is present in GMS current operation. A low priority site inspection is recommended for this site under the TWC PA/SI program.



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~ 2pm south-west

Comments: 11811 Charles
yellow bucket marks approximate
low point for drainage - hose
on right of picture - see below.



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~ 2pm south west

Comments: 11811 Charles
brown bldg is storage for chemicals



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~ 2pm south west

Comments: 11811 Charles
water hoses are on left
side of building



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~2pm southwest

Comments: 11811 Charles
drums near left of picture are
missing bungs



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~2pm west

Comments: 11811 Charles
drum reportedly containing
pesticide rinse are to left
side and behind red sprayer.



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/6/86 ~2pm south

Comments: 11811 Charles
2 red + white and black are
watered hydraulic fluid - black
drum is labeled toluene



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 ~ 2pm west

Comments: 3812 Osage



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 10:25am east

Comments: 11239 A Crown
Park Plaza.



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 4:10pm southwest

Comments: BB25 Schumacher
remaining drums at
Storage Shed



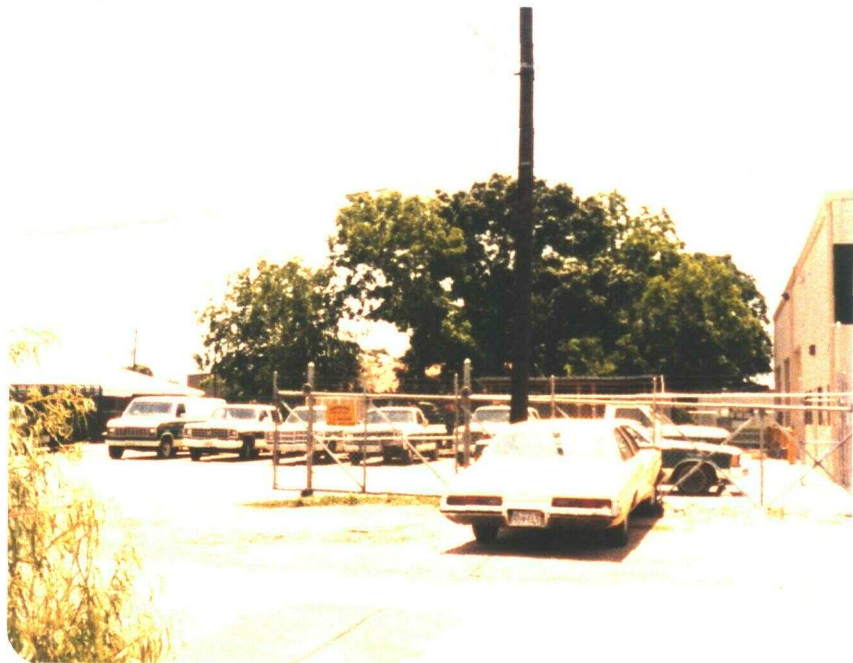
Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 ~1:15pm South

Comments: 8625 Schumacher
main building



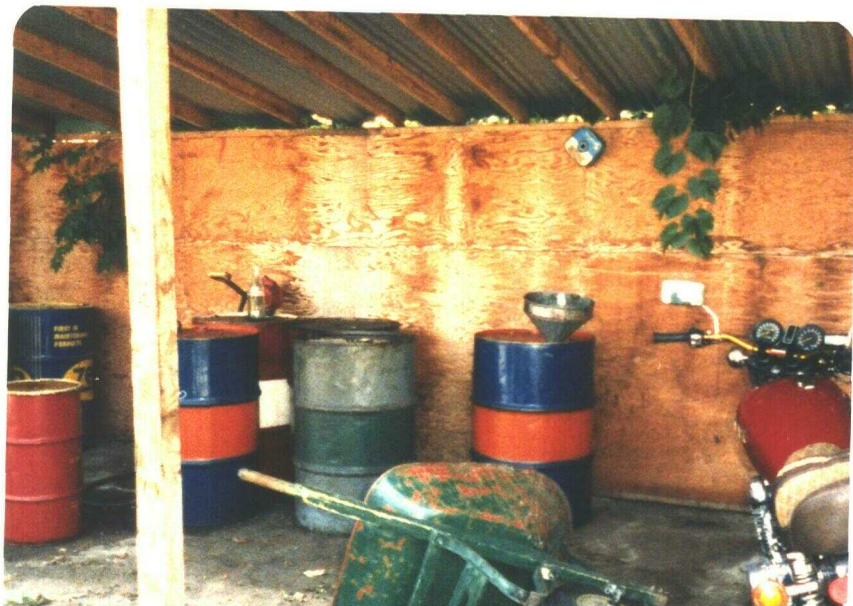
Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 ~1:15pm Southwest

Comments: 8625 Schumacher
Storage Shed roof visible over
fence line



Photographer/Witness

Phyllis Frank

Date/Time/Direction

5/8/86 ~1:10pm South

Comments: 8625 Schumacher
drums at storage shed.